

Darrel B. Carter
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JUDGE TIMOTHY W. DORE
Chapter: 11
Date: 10/2/15
Place: Seattle
Time: 9:30 a.m.
Response Date: 9/25/15

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re: Festival Transaction Service, Inc.
Debtor.

No. 15-14473

NOTICE OF AND APPLICATION FOR
ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES

TO: ALL CREDITORS AND PARTIES-IN-INTEREST
AND TO: THE UNITED STATES BANKRUPTCY COURT CLERK
AND TO: THE UNITED STATES TRUSTEE

Notice of Hearing on Application for Allowance of Compensation and Reimbursement of Expenses

PLEASE TAKE NOTICE that the Application for Allowance of Compensation and Reimbursement of Expenses ("Application") set forth below has been filed by Darrel B. Carter and CBG LAW GROUP, PLLC, counsel for debtor, Festival Transaction Service, Inc., and IS SET FOR HEARING as follows:

JUDGE: TIMOTHY W. DORE
PLACE: United States Courthouse, Room 8106
700 Stewart Street
Seattle, Washington, 98101

TIME: 9:30 a.m.
DATE: 10/2/15

Application for Employment - 1

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1 IF YOU OPPOSE the granting of the relief requested in the Motion, you must file your written
2 response with the court clerk, and deliver copies to the attorney for debtor, Darrel B. Carter, at
3 CBG Law Group PLLC, 11100 NE 8th Street., Suite 380, Bellevue, WA 98004, NOT LATER
4 THAN THE RESPONSE DATE, which is 9/25/15.

5 IF NO RESPONSE IS TIMELY FILED AND SERVED, the court may, in its discretion,
6 GRANT THE OBJECTION BEFORE THE HEARING, WITHOUT FURTHER HEARING, and
7 strike the hearing.

8 First Application for Interim Allowance of Compensation and Reimbursement of
9 Expenses

10 The application of Darrel B. Carter and CBG LAW GROUP, PLLC respectfully represents.

11 1. Applicant is the attorney for Festival Transaction Service, Inc., the debtor herein, and
12 makes this application for an allowance of compensation for professional services rendered and
13 for reimbursement for actual and necessary costs and expenses incurred by it in the
14 representation of the debtor in this proceeding from the beginning of this case until September 2,
15 2015.

16 2. Debtor filed this bankruptcy case on July 23, 2015.

17 3. Prior to the filing, Debtor approached applicant regarding representation in this matter
18 and this court executed an order appointing applicant as counsel for the debtor on or about
19 August 17, 2015 (Docket No. 26). The terms and conditions of employment and compensation
20 approved by the court at that time provided that debtor would pay applicants on an hourly basis.

21 4. The source of compensation was the Debtor. To date, debtor has deposited \$5,000.00
22 towards accrued fees and costs that have been deposited in a trust account, pending notice and
23 hearing before this court.

24 5. The names of all of applicant's professional and paraprofessionals requesting fees, their
25 hourly rates (which are the same as those charged non-bankruptcy clients) and the time period
26 covered by the application are set forth in the computer printout attached hereto as Exhibit A.

27 6. All services for which compensation is requested by applicant were performed for and on
28 behalf of said debtor, and not on behalf of any committee, creditor, or other person.

29 Application for Employment - 2

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1 7. Your applicant has rendered professional services to the debtor as follows:

2 A. Your applicant advised the debtor regarding the effect of the filing of this bankruptcy
3 proceeding on debts owed various taxing agencies and other creditors; the effect of the filing of
4 the bankruptcy proceeding on relations with the creditors and their rights under the bankruptcy
5 laws.

6 B. Your applicant assisted the debtors in preparing its schedules which were with the court.

7 C. Your applicant reviewed the documentation held by the creditors to determine whether or
8 not their interests in the debtor's properties were valid.

9 D. Your applicant advised the debtor regarding the priority and status of its tax obligations to
10 the federal government.

11 E. Your applicant has dealt with representatives of creditors of the debtor.

12 F. To the best of your applicant's knowledge there are no significant unpaid administrative
13 expenses that would have a higher priority to the funds held by Counsel than Counsel.

14 8. Other than your applicant and Counsel for the Unsecured Creditors Committee, no other
15 professionals have been appointed in this matter.

16 9. Attached hereto and incorporated herein as Exhibit A is a detailed computer generated
17 time accounting for each attorney who rendered services in connection with the representation,
18 together with a table setting forth the usual hourly rates charged by the law firm for said
19 attorney.
20

21 Exhibit A also contains a detailed accounting of the costs and expenses incurred for
22 which reimbursement is sought.
23

24 10. Your applicant is making its first interim application for payment of fees and costs.

25 11. The reasonable value of the services rendered by your applicant as attorney for said
26 debtor in this case under Chapter 11 is \$7,104.00. In addition, the costs and expenses in this case
27 total \$40.80 for a total request of \$7,144.80.

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WHEREFORE, your applicant prays that an allowance be made to it of \$7,104.00 as compensation for professional services rendered and \$40.80 for reimbursement for actual and necessary costs and expenses incurred by it in this proceeding. Said amounts are to be paid as follows: \$5,000.00 from the retainer paid by Debtor and the balance to be paid as an administrative expense in this matter.

DATED this 2nd day of September, 2015.

Applicant

/s/ Darrel Carter
Darrel B. Carter, WSBA# 20318
Attorney for Debtor

Application for Employment - 4

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Declaration

Darrel B. Carter, being first duly sworn on oath deposes and says:

1. I am an attorney with the Firm of CBG LAW GROUP, PLLC. I have personal knowledge of the facts set forth herein, and I am competent to testify to the same.

2. The members of CBG LAW GROUP, PLLC are the attorneys for Debtor herein.

3. Attached as Exhibit A is a true a correct copy of the time spent and fees expended in by CBG Law Group, PLLC in Debtors' case during the time period of the beginning of the case to September 2, 2015.

4. CBG Law Group, PLLC has no agreement to share compensation in this matter.

5. CBG Law Group, PLLC has been awarded \$0 in previous fee applications in this matter.

I declare under penalty of perjury that the foregoing is true.

Dated this 2nd day of September, 2015.

/s/ Darrel Carter
Darrel B. Carter

Application for Employment - 5

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